



THE CITY OF NEW YORK
LAW DEPARTMENT

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June 12, 2023

APPLICATION GRANTED
SO ORDERED *Vern Broderick*

VERNON S. BRODERICK
U.S.D.J. 06/13/2023

City Defendants shall file the executed
stipulation by June 26, 2023.

Via ECF

The Honorable Vernon S. Broderick
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Jones v. City of New York, et al., No. 18 CV 1937 (VSB)(GWG)

Dear Judge Broderick:

I am an Assistant Corporation Counsel at the Office of the Corporation Counsel of the City of New York, the Honorable Sylvia O. Hinds-Radix, attorney for Defendants City of New York, Corizon Health, Inc., Commissioner Joseph Ponte, Dr. Rostislav Davydov, and PA Jorge Villalobos (collectively, the “City Defendants”) in the above-referenced action.

I write to respectfully provide a belated status update on the execution of a stipulation of settlement in this matter and to respectfully request a 2-week extension of the time by which City Defendants must file the pertinent stipulation. As noted in the City Defendants’ prior application to the Court, (ECF No. 184), draft stipulations of settlement of varying scope were provided to Plaintiff for his consideration and execution last month. Plaintiff has since returned a stipulation, signed by him, that provides for the dismissal of only the City Defendants from this action, leaving the claims against Defendant Segal live. I today transmitted this stipulation to Defendant Segal’s counsel for execution, in advance of countersigning the stipulation myself. As such, City Defendants request a 2-week extension, to June 26, 2023, of their time to file the completely executed stipulation with the Court.

I also wish to apologize to the Court for failing to comply with the Court’s order, (ECF No. 185), directing that a status letter be filed on or before May 30, 2023, regarding the execution of a stipulation. As described in my May 12, 2023 letter to the Court, I have recently faced some medical issues that have required frequent absences from work; indeed, these issues

are now requiring me to take unexpected leave. As such, I overlooked this May 30, 2023 deadline, and I apologize for my oversight. Although a colleague of mine will be monitoring this action during my leave, I am committed to executing the aforementioned stipulation as soon as possible, after Defendant Segal's counsel is able to do so.

This is the second request for an extension of City Defendants' time to file a stipulation of settlement, the first having been granted on May 15, 2023. (ECF No. 185.) Due to Plaintiff's *pro se* and incarcerated status, I have also not been able to receive his consent to the requested extension.

I thank the Court for its consideration of this matter.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

cc: ***Via First-Class Mail***
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Via ECF
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